28

///

1 JOHN J. SAVAGE, ESQ. Nevada Bar. No. 11455 HOWARD & HOWARD ATTORNEYS PLLC 3800 Howard Hughes Parkway, Suite 1000 Las Vegas, Nevada 89169 Telephone: (702) 257-1483 Facsimile: (702) 567-1568 jjs@h2law.com Counsel for Defendant 6 Ringcaptcha, Inc. 7 UNITED STATES DISTRICT COURT 8 DISTRICT OF NEVADA INFOBIP, LTD., a United Kingdom Private Case No. 2:22-cy-01244-APG-BNW Limited Company, 10 STIPULATION AND ORDER TO 11 Plaintiff, EXTEND TIME FOR DEFENDANT RINGCAPTCHA, INC. TO RESPOND TO VS. 12 INFOBIP, LTD.'S COMPLAINT RINGCAPTCHA, INC., a foreign Delaware 13 Corporation, and DOES 1 through 10, (FIRST REQUEST) 14 Defendants. 15 The parties, through counsel, hereby stipulate and agree as follows: 16 Defendant RINGCAPTCHA, INC. ("Defendant"), shall have an extension of time until 17 and including September 9, 2022, in which to file its Answer or other responsive pleading to 18 Plaintiff INFOBIP, LTD.'s ("Plaintiff") Complaint. 19 20 The need to enlarge time for Defendant to respond to Plaintiff's Complaint is based on the following factors. Defendant retained Nevada counsel only two days before its response to the 21 Complaint was due. The additional time requested will permit Defendant's counsel to collect 22 documents and information necessary for an informed response to the Complaint. 23 /// 24 /// 25 26 /// /// 27

[STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO COMPLAINT] 4859-4168-4272, v. 1

1
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

28

HOWARD & HOWARD ATTORNEYS PLLC	GORDON REES SCULLY MANSUKHANI LLP	
Dated this 29th day of August 2022.	Dated this 29th day of August 2022	
This stipulation is brought in good faith and not for purposes of delay.		

By: <u>/s/ John J. Savage</u> JOHN J. SAVAGE, ESQ. Nevada Bar. No. 11455 3800 Howard Hughes Parkway, Suite 1000 Las Vegas, Nevada 89169

Counsel for Defendant Ringcaptcha, Inc.

By: <u>/s/ Thierry V. Barkley</u>
SEAN P. FLYNN, ESQ.
Nevada Bar No. 15408
THIERRY V. BARKLEY, ESQ.
Nevada Bar No. 724
1 East Liberty Street,
Suite 424
Reno, Nevada 89501

Counsel for Plaintiff Infobip, Ltd.

IT IS SO ORDERED

UNITED STATES MAGISTRATE JUDGE

DATED: August 30, 2022